

EXHIBIT B

IN THE CIRCUIT COURT FOR ANDERSON COUNTY, TENNESSEE

Joyce Gaddie, individually and as the)	
Administrator ad litem of the Estate of Vern)	
Gaddie Jr.,)	
)	
Plaintiff)	
)	
v.)	No. B5LA0264
)	
GGNSC Clinton LLC)	Jury Demand
d/b/a Golden LivingCenter-Windwood,)	
)	
Defendant)	

NOTICE OF REMOVAL TO OPPOSING COUNSEL

TO: David M. Boyd, Esq.
The Boyd Firm, PC
900 S. Gay Street, Suite 705
Knoxville, TN 37902

Notice is hereby given that Defendant GGNSC Clinton LLC d/b/a Golden LivingCenter-Windwood has this day filed in the United States District Court for the Eastern District of Tennessee, at Knoxville, a notice of removal of this cause from the Circuit Court of Anderson County, Tennessee to said District Court and have attached to said notice of removal a copy of all pleadings filed in this cause to date and served upon Defendant. A copy of Defendant's Notice of Removal is attached hereto and served herewith.

DATED: February 5, 2016.

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC

By: 

Thomas O. Helton (BPR # 001929)

Daniel J. White (BPR # 030402)

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265 Brookview Centre Way, Suite 600

Knoxville, TN 37919

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smcmillan@bakerdonelson.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that I have on this the 5th day of February, 2016, caused a copy of the foregoing to be served upon the following counsel of record for the Plaintiff in the above-styled cause:

David M. Boyd
The Boyd Firm, PC
900 S. Gay Street, Suite 705
Knoxville, TN 37902

by placing the same in the United States Mail, first-class postage prepaid.

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC

By: 

Thomas O. Helton

IN THE CIRCUIT COURT FOR ANDERSON COUNTY, TENNESSEE

Joyce Gaddie, individually and as the)	
Administrator ad litem of the Estate of Vern)	
Gaddie Jr.,)	
)	
Plaintiff)	
)	
v.)	No. B5LA0264
)	
GGNSC Clinton LLC)	Jury Demand
d/b/a Golden LivingCenter-Windwood,)	
)	
Defendant)	

NOTICE OF REMOVAL

TO: William T. Jones
Anderson County Circuit Court Clerk
Anderson County Courthouse, Room 301
100 North Main Street
Clinton, TN 37716


Notice is hereby given that this cause has been removed to the United States District Court for the Eastern District of Tennessee, at Knoxville, and that the state court may proceed no further herein.

You will find herewith a copy of a Notice of Removal which has been filed by Defendant GGNSC Clinton LLC d/b/a Golden LivingCenter-Windwood this day in said District Court.

Please promptly acknowledge receipt and the filing of this Notice of Removal and said copy of the District Court Notice of Removal in your office by completing and signing the Acknowledgement of Receipt of Notice of Removal found at the bottom of this Notice, an extra copy of which is enclosed for this purpose with the request that it be returned when signed.

DATED: February 5, 2016.

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC

By:  _____

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Attorneys for Defendant

ACKNOWLEDGEMENT OF RECEIPT OF NOTICE OF REMOVAL

I, William T. Jones, Anderson County Circuit Court Clerk, do hereby acknowledge receipt of the above Notice of Removal and papers referred to therein, and certify that I have on the date and hour below stated filed a copy of the Notice of Removal of this cause to the United States District Court for the Eastern District of Tennessee in my office at Springfield, Tennessee, this ____ day of _____, 2016 at _____.m. Eastern Daylight Time.

Anderson County Circuit Court Clerk

By: _____

CERTIFICATE OF SERVICE

I hereby certify that I have on this the 5th day of February, 2016, caused a copy of the foregoing to be served upon the following counsel of record for the Plaintiff in the above-styled cause:

David M. Boyd
The Boyd Firm, PC
900 S. Gay Street, Suite 705
Knoxville, TN 37902

by placing the same in the United States Mail, first-class postage prepaid.

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC

By:  _____
Thomas O. Helton